



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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February 23, 2017

17-NWP-020

Mr. Doug Shoop, Manager  
Richland Operations Office  
United States Department of Energy  
PO Box 550, MSIN: A7-50  
Richland, Washington 99352

Re: Inspection Close-out Letter for Air Operating Permit (AOP) Discharge Points 1.4.27 E-85  
Fuel Station and 1.4.36 600 Area Gas Distribution

Dear Mr. Shoop:

As part of continuous compliance verification, the Department of Ecology (Ecology) conducts facility inspections of units subject to the Hanford Site AOP and Approval Orders. This letter is provided to communicate the results of an inspection that was performed by Ecology on December 8, 2016, of discharge point 1.4.27 E-85 Fuel Station and 1.4.36 600 Area Gas Distribution. Compliance with applicable conditions of AOP 00-05-06 Renewal 2, Revision B and Approval Order No. DE06NWP-001 was the basis of the inspection. Records were reviewed for time periods January 1, 2015 to December 8, 2016.

The results of the inspection and compliance status are provided below along with any recommendations or action items.

**1.4.27 E-85 Fuel Station**

- Ecology has determined that discharge point 1.4.27 E-85 Fuel Station was in intermittent compliance for 2015 and 2016. See below for details of determination.
  - In reference to the Emission Limits permit condition: Compliance is demonstrated by installation of BACT and T-BACT emission controls including: (1) submerged or bottom fill pipe such that the pipe inlet is fully submerged when the fluid level in the tank is six inches (15.2 cm) or greater, and (2) fitting to vapor balance gasoline vapors with the delivery transport tank (3) tank caps are secured tightly and locked down between tank loading events (4) adapters, fill tube gaskets, and poppet valves be maintained in good working condition (5) the automatic cut-off valve and lever of the dispensing pump be maintained in good working order (6) the hose swivel be maintained leak-free and without excessive stiffness (7) maintenance of the system to



- During the inspection Ecology observed that the emission controls were in place, functioning, and appeared to be maintained appropriately. However, Ecology did observe dirt/diesel staining atop diesel pumps #1 and #6 indicating a minor leak.
- The required records for the above permit conditions are: 1) Records of fuel storage tank loading detail for each load received: the date of the receipt, volume received, delivery transport tank identifying information, vapor balance fitted to transport tank (yes/no), and leak/spill assessment (for example, "None"), 2) Maintenance records including dates, nature of maintenance, and any leakage test performed, 3) compliance demonstration for application of appropriate air pollution emission factors 4) operation and maintenance (O&M) manuals for all equipment, procedures and controls associated with the proposed activities that have the potential to affect emissions to the atmosphere.
- Through a review of the available records, Ecology determined that: 1) compliance was intermittently demonstrated in 2015 and continuously demonstrated for 2016 in reference to maintaining records of fuel storage tank loading details and 2) compliance was continuously demonstrated for 2015 and 2016 in reference to retention of maintenance records/O&M manuals and applying appropriate emission factors. Ecology was notified on January 19, 2017 that during the process of retrieving the requested records, the U.S. Department of Energy (USDOE) discovered that some fuel storage tank loading records (2014 and 2015) could not be located for the most recent 36 month period. The USDOE believe the 2014 and 2015 fuel storage tank loading records were inadvertently discarded by an employee who retired and was unaware of the retention requirements.
- It is recommended that current and future employees of the E-85 fuel station understand the retention requirements of AOP required records. It is also recommended to clean the residual staining atop diesel pumps #1 and #6 and check for minor leaks.

#### **1.4.36 600 Area Gas Distribution**

- Ecology has determined that discharge point 1.4.36 600 Area Gas Distribution was in continuous compliance for 2015 and 2016.
- In reference to the permit conditions regarding the installation and use of bottom fill lines and fittings to vapor balance gasoline vapors, Ecology observed during the inspection that the associated lines and fittings are in place and used correctly during loading of gasoline.

Mr. Doug Shoop  
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Should you have any questions, please contact me at [daniel.heuston@ecy.wa.gov](mailto:daniel.heuston@ecy.wa.gov) or (509) 372-78395.

Sincerely,

A handwritten signature in black ink that reads "Daniel Heuston". The signature is written in a cursive, flowing style.

Daniel Heuston, PE  
Environmental Engineer 3  
Nuclear Waste Program

cc electronic:

Donald Dossett, USEPA  
Doug Hardesty, USEPA  
Jim McAuley, USEPA  
Katie McClintock, USEPA  
Dennis Bowser, USDOE-ORP  
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Environmental Portal  
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cc: Robin Priddy, BCAA  
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Administrative Record  
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